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September 12, 2022

Via ECF

Hon. Pamela K. Chen
U.S. District Court, Eastern District of New York

RE: *Dawkins v. Schott NYC Corp.*

Case No.: 1:22-cv-3617

Plaintiff's Response to Pre-Motion Letter Re: Proposed Motion to Dismiss

Dear Judge Chen,

We represent the Plaintiff in the above-referenced matter. Having conferred with Defendant's counsel, we write pursuant to Your Honor's order of September 7, 2022, to propose a briefing schedule in the event that the Court deems a pre-motion conference unnecessary and instead orders the parties to brief Defendant's anticipated motion.

Our proposed briefing schedule is as follows:

Plaintiff's motion due October 25, 2022

Defendant's opposition due November 15, 2022

Plaintiff's reply due November 23, 2022

We thank the Court for its kind consideration and courtesies.

Respectfully Submitted,

/s/ Mark Rozenberg

By: Mark Rozenberg, Esq.